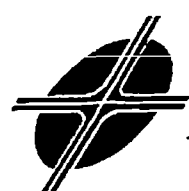


2-10-89  
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F: W.I. ~~COA~~ EMERGENCY - WATER



**ASH GROVE CEMENT WEST, INC.**

3801 EAST MARGINAL WAY, SOUTH  
SEATTLE, WA 98134  
PLANT OFFICE (206) 623-5596

John Glynn  
Washington State Dept. of Ecology  
PV-11  
Olympia, Washington 98504

February 10, 1989

Dear Mr. Glynn:

We attended the workshop on February 10<sup>th</sup> in Seattle and appreciate this opportunity to further communicate our concerns to you.

Ash Grove Cement West, Inc., operates four cement distribution terminals in the state. At none of these terminals do we manufacture cement. You may wish to differentiate cement terminals from cement manufacturing plants in your industrial categories. Only two of our terminals require discharge permits. Both are located along the Duwamish River in Seattle.

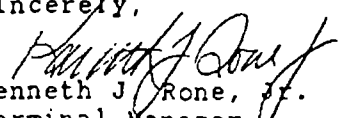
Our largest terminal operates under a State Discharge Permit where area runoff, non-contact cooling water and (intermittently) clarified wash water from an adjoining ready-mix plant is discharged to ground water. Our permitted flow is 218,000 gallons/day but our actual flow is probably under 10,000 gallons/day.

The other terminal has applied for, and not yet received, an NPDES permit to discharge approximately 16,000 gallons/day of surface runoff.

We encourage the department to reconsider the impact of non-graduated fees on those proposed industries. Surely the impacts I have described do not warrant the administrative involvement that fees in the thousands of dollars would reflect. We would suggest all discharges in the cement classification have a graduated fee schedule and that cement terminals be recognized as having a lesser impact than manufacturing plants.

Should you wish further information on our industry and the characterization of our wastewater discharges, please contact the Portland Cement Association in Skokie Illinois at (312) 966-6200.

Sincerely,

  
Kenneth J. Rone, Jr.  
Terminal Manager

cc: Roy Bettsworth - WACA



AGC2H000825